

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**REPLY IN SUPPORT OF DEBTOR'S  
THIRTIETH OMNIBUS OBJECTION TO CERTAIN CLAIMS**

**(INSUFFICIENT DOCUMENTATION)**

The City of Detroit ("City"), by its undersigned counsel, files this reply in support of its *Thirtieth Omnibus Objection to Certain Claims* ("Objection," Doc. No. 10786), stating as follows:

1. On February 26, 2016, the City filed its Objection. The following individuals filed responses to the Objection:<sup>1</sup>

- (a) Response filed by George M. Pieprzyk [Doc. No. 10903] ("Pieprzyk Response").<sup>2</sup> Pieprzyk's proof of claim and his response to the Objection are attached as Exhibits 1 and 2.
- (b) Response filed by Jacqueline Knowles [Doc. No. 10863] ("Knowles Response"; and collectively with the Pieprzyk

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<sup>1</sup> Additional responses were filed, but all other responses were either stricken for filing deficiencies or will be handled via a separate procedure recently approved by the Court. [Doc. No. 10941.] As noted below, both Responses are subject to pending deficiency notices.

<sup>2</sup> A deficiency noticed was entered by the Court on March 23, 2016. [Doc. No. 10918]. The deficiency has not yet been cured.

Response, the “Responses”).<sup>3</sup> Knowles’s proof of claim and his response to the Objection are attached as Exhibits 3 and 4.

### **Pieprzyk Response**

2. The Pieprzyk Response should be overruled. The Objection stated that Pieprzyk’s proof of claim lacked any documentation showing that the City owed him the money claimed.<sup>4</sup> His proof of claim states that he is owed \$140,000 for “30 years of service ½ of my life” as well as for stress and other reasons. Ex. 1. In response to the Objection, he states “I George M Pieprzyk do not want the court to eliminate or change my claim # 1906.” Ex. 2. Neither filing constitutes documentation evidencing any claim against the City at all, much less a claim in the amount of \$140,000. The Objection should be sustained as to this claim.

### **Knowles Response**

3. The Knowles Response also should be overruled. The Objection objected to Knowles’s proof of claim because it lacked any documentation showing that the City owed her \$18,150. Knowles’s proof of claim simply states that the City owes her for “Loss of financial income, Forfeit of contract by City of Detroit.” Ex. 3. The Knowles Response provides no further assistance in understanding the basis for her claim. In the Knowles Response, Knowles

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<sup>3</sup> A deficiency noticed was entered by the Court on March 21, 2016. [Doc. No. 10869]. The deficiency has not yet been cured.

<sup>4</sup> Indeed, Federal Rule of Bankruptcy Procedure 3001(c)(1) notes that a claim based on writings must be filed with the documentation supporting it.

expresses anger that the City filed for bankruptcy protection, but provides no documentation explaining why the City owes her money. Ex. 4. As such, it fails to respond to the Objection, and the Objection should be upheld as to this claim.

### **CONCLUSION**

For these reasons, the City asks the Court to overrule the Responses and sustain the City's Objection to these claims.

Dated: March 25, 2016

By: /s/ Marc N. Swanson

Jonathan S. Green (P33140)

Marc N. Swanson (P71149)

MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.

150 West Jefferson, Suite 2500

Detroit, Michigan 48226

Telephone: (313) 496-7591

Facsimile: (313) 496-8451

green@millercanfield.com

swansonm@millercanfield.com

Charles N. Raimi (P29746)

Deputy Corporation Counsel

City of Detroit Law Department

2 Woodward Avenue, Suite 500

Coleman A. Young Municipal Center

Detroit, Michigan 48226

Telephone: (313) 237-5037

Facsimile: (313) 224-5505

raimic@detroitmi.gov

ATTORNEYS FOR THE CITY OF DETROIT



<b>UNITED STATES BANKRUPTCY COURT</b>		<b>EASTERN DISTRICT of MICHIGAN</b>		<b>CHAPTER 9 PROOF OF CLAIM</b>	
Name of Debtor: <b>City of Detroit, Michigan</b>			Case Number: <b>13-53846</b>		
NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing.					
Name of Creditor (the person or other entity to whom the debtor owes money or property):					
Name and address where notices should be sent: <b>George M. Pieprztk 22527 Fullerton Detroit 48223-3106 mich Telephone number: 313 531 6513 email: [redacted]</b>				<input type="checkbox"/> Check this box if this claim amends a previously filed claim. <b>COURT CLAIM NUMBER: [redacted]</b> Filed on: _____	
Name and address where payment should be sent (if different from above):				<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving _____	
Telephone number: _____ email: _____					
1. Amount of Claim as of Date Case Filed: <b>\$140,000</b>				<b>FEB 24 2014</b>	
If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.					
2. Basis for Claim: <b>30 years of service to my wife's stream &amp; physical disability</b>					
3. Last four digits of card number by which creditor identifies debtor: [redacted]			3a. Debtor may have scheduled account as: _____		
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: _____ Value of Property: \$ _____ Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed or <input type="checkbox"/> Variable			Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		
5. Amount of Claim Entitled to Priority as an Administrative Expense under 11 U.S.C. §§ 503(b)(9) and 507(a)(2).				\$ _____	
5b. Amount of Claim Otherwise Entitled to Priority. Specify Applicable Section of 11 U.S.C. § _____				\$ _____	
6. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)					
7. Documents: Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. (See instruction #7, and the definition of "redacted".) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain: _____					
8. Signature: (See instruction # 8)					
<input checked="" type="checkbox"/> I am the creditor. <input type="checkbox"/> I am the creditor's authorized agent. <input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. <input type="checkbox"/> I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.) (See Bankruptcy Rule 3004.)					
I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.					
Print Name: <b>George M. Pieprztk</b> Title: <b>Field Investigator</b> Company: <b>Water Department, DWS</b> Address and telephone number (if different from notice address above): _____ (Signature) <b>George M. Pieprztk</b> (Date) <b>2-13-2014</b>					
Telephone number: _____					



11/11 3-12-16

I George M Piepryk Do Not  
WANT The COURT To Eliminate,  
OR change my Chain # 1906.  
George M Piepryk  
CASE # 13-5384

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
DETROIT

2016 MAR 23 A 10:14

FILED





B10 (Official Form 10) (04/13) (Modified)

## UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT of MICHIGAN

Name of Debtor: City of Detroit, Michigan

Case Number: 13-53846

NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing.

Name of Creditor (the person or other entity to whom the debtor owes money or property):

Jacqueline Knowles

Name and address where notices should be sent:

15015 Stahelin Rd

Telephone number: 313 412-9007

email: JACKIE\_Knowles@yahoo.com

Name and address where payment should be sent (if different from above):

SAME

Telephone number:

email:

## 1. Amount of Claim as of Date Case Filed:

\$18,150, 2009-2013

If all or part of the claim is secured, complete item 4.

If all or part of the claim is entitled to priority, complete item 5.

Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.

## 2. Basis for Claim:

(See instruction #2)

Loss of financial income  
forfeit of contract by City of Detroit

## 3. Last four digits of any number by which creditor identifies debtor:

3a. Debtor may have scheduled account as:

(See instruction #3a)

## 4. Secured Claim (See instruction #4)

Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information.

Nature of property or right of setoff: ☐ Real Estate ☐ Motor Vehicle ☐ Other

Describe:

Value of Property: \$

Annual Interest Rate (when case was filed) % ☐ Fixed or ☐ Variable

Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$

Basis for perfection:

Amount of Secured Claim: \$

Amount Unsecured: \$

## 5. Amount of Claim Entitled to Priority as an Administrative Expense under 11 U.S.C. §§ 503(b)(9) and 507(a)(2).

5b. Amount of Claim Otherwise Entitled to Priority. Specify Applicable Section of 11 U.S.C. §

## 6. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)

7. Documents: Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. (See instruction #7, and the definition of "redacted.") DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.

## 8. Signature: (See instruction #8)

Check the appropriate box.

☒ I am the creditor. ☐ I am the creditor's authorized agent.☐ I am the trustee, or the debtor, or their authorized agent. (See Bankruptcy Rule 3004.)☐ I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.)

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.

Print Name: Jacqueline Knowles

Title: SA III

Company: City of Detroit

Address and telephone number (if different from notice address above):

(Signature)

(Date)

Telephone number: 313 412-9007

email: JACKIE\_Knowles@yahoo.com

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

FILED

FEB 20 2014

COURT USE ONLY

US Bankruptcy Court  
MI Eastern District

Court Claim Number: (if known)

Filed on:

Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement of claimant.

RECEIVED

FEB 24 2014

KURTZMAN CARSON CONSULTANTS



March 18, 2016

Clerk of the Court  
United States Bankruptcy Court  
211 W. Fort Street, Suite 2100  
Detroit, MI 48226

FILED  
2016 MAR 21 A 11:09  
U.S. BANKRUPTCY COURT  
E.D. MICHIGAN-DETROIT

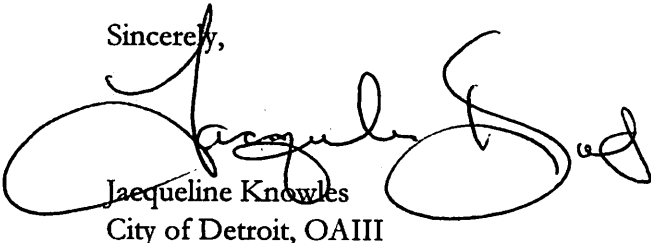
Marc N. Swanson  
Miller, Canfield, Paddock and Stone, PLC  
150 West Jefferson, Suite 2500  
Detroit, MI 48226

**Re: Bankruptcy Case No. 13-53846**

Dear, Honorable Thomas J. Tucker:

I am submitting this letter to oppose and prevent the modification, expunge, elimination or disallowing of my claim. The City of Detroit frivolous mismanagement of funds is of no doing by city employees. Therefore city employees should not be punished or held accountable. It was reported Thursday, March 17, 2016 by Channel 4 News that \$50 million dollars was discovered in bond funds which had gone unspent over several decades and \$11.7 million dollars is to be utilized on forty city parks and playgrounds and the remaining funds will pay to build a high-tech real-time crime center and to construct a new 8<sup>th</sup> Precinct for the Police Department. Yet, the City of Detroit filed bankruptcy and illegally took money from our employee' pension and annuity fund. Many corporations, citizens, and most importantly the employees was misled and misrepresented by city government. City employees' should not be made a scapegoat for the poor decisions, poor investments and unprofessional conduct made by city government. The employees' voiced opinion was disregarded when given the opportunity to elaborate on the irrational decisions made by the city. The accountabilities lies on city government but employees and retirees has endured the burden. The city government has caused financial hardship to many pensioners' and employees' lively hood. The City of Detroit's actions has been unconstitutional, and it would be immoral if city government was not held accountable. All involved in this lawsuit against the city government should be compensated and made hold for the many lives the city have ruined. The City of Detroit have an obligation to represent their employees, citizens, and corporates with the upmost respect, honest and dignity and have failed to do so.

Sincerely,



Jaqueline Knowles  
City of Detroit, OAHII